

KATHY A. DOCKERY
CHAPTER 13 TRUSTEE
801 S. FIGUEROA ST., SUITE 1850
LOS ANGELES, CA 90017
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UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
LOS ANGELES DIVISION

IN RE:

MARIO RODRIGUEZ BONILLA

DEBTOR(S).

Case No: 2:18-bk-23471-NB

CHAPTER 13

**TRUSTEE'S NOTICE OF MOTION AND MOTION TO
DISMISS CHAPTER 13 CASE DUE TO DELINQUENT
PLAN PAYMENTS PURSUANT TO §1307(c)(6) AND
L.B.R. 3015-1(k)(1)); DECLARATION OF KATHY A.
DOCKERY IN SUPPORT THEREOF**

DATE: August 27, 2020
TIME: 11:00 am
PLACE: ROYBAL BUILDING
Courtroom 1545 15th Floor
255 EAST TEMPLE STREET
LOS ANGELES, CA 90012

TO THE HONORABLE NEIL W. BASON, UNITED STATES BANKRUPTCY JUDGE, THE DEBTOR(S)

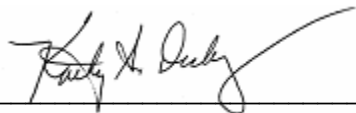
AND ALL OTHER PARTIES IN INTEREST:

PLEASE TAKE NOTICE that the Chapter 13 Trustee, Kathy A. Dockery, hereby moves for an order dismissing this case pursuant to 11 U.S.C. §1307(c)(6) and Local Bankruptcy Rule 3015-1(k)(1) due to delinquent plan payments which has caused a material default with respect to the terms of the confirmed plan (hereinafter "Motion"). As of the date of service of this motion, the Debtor(s) is delinquent in the amount \$7,212.00.

Pursuant to Local Bankruptcy Rule 9013-1(f)(1), notice is further given that any person opposing this motion shall, not later than fourteen (14) days prior to the above-referenced hearing date, serve upon the Chapter 13 Trustee and file with the clerk's office, a written statement explaining all reasons in opposition thereto.

This Motion is based on this Notice, the Exhibits attached hereto and incorporated herein, the Declaration of Kathy A. Dockery and any further argument and evidence offered at the hearing.

DATED: 6/30/2020



Kathy A. Dockery, Chapter 13 Trustee

DECLARATION OF KATHY A. DOCKERY

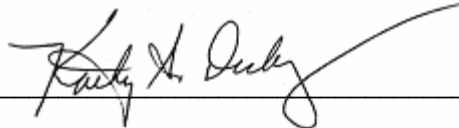
I, Kathy A. Dockery, declare as follows:

1. I am the duly appointed, qualified and standing Chapter 13 Trustee in this case and by virtue thereof, I have personal knowledge of files and records kept by my office in the regular course of business. I have personally reviewed the files and records kept by my office in the within case. The following facts are true and correct and within my own personal knowledge and I could and would testify competently thereto if called to do so.

2. As of the date of service of this Motion, the Debtor(s) is delinquent in the amount of \$7,212.00. A true and correct copy of this case's status report at the time of service of this motion is attached hereto and incorporated herein by reference as Exhibit "A".

I declare, under penalty of perjury, that the foregoing is true and correct.

DATED: 6/30/20

A handwritten signature in black ink, appearing to read "Kathy A. Dockery", is written over a horizontal line.

KATHY A. DOCKERY, CHAPTER 13 TRUSTEE

DELINQUENCY REPORT AS OF June 30, 2020

Total Bankruptcy Payments Required: \$45,728.00

Total Bankruptcy Payments Received: \$38,516.00

Total Delinquent Amount: \$7,212.00

BANKRUPTCY PAYMENTS RECEIVED

TOTAL BANKRUPTCY PAYMENTS AS OF June 30, 2020:\$38,516.00

<u>Date</u>	<u>Amount</u>	<u>Date</u>	<u>Amount</u>	<u>Date</u>	<u>Amount</u>	<u>Date</u>	<u>Amount</u>	<u>Date</u>	<u>Amount</u>
12/27/18	\$2,340.00	1/15/19	\$2,520.00	2/13/19	\$2,404.00	3/13/19	\$2,404.00		
4/10/19	\$2,404.00	5/15/19	\$2,404.00	6/10/19	\$2,404.00	7/15/19	\$2,404.00		
8/12/19	\$2,404.00	9/10/19	\$2,404.00	10/16/19	\$2,404.00	11/13/19	\$2,404.00		
12/10/19	\$2,404.00	1/13/20	\$2,404.00	2/10/20	\$2,404.00	3/9/20	\$2,404.00		

BANKRUPTCY PAYMENTS REGISTER

TERM: 60 Months

<u>PAYMENT #</u>	<u>DATE AMOUNT</u>	<u>PAYMENT #</u>	<u>DATE AMOUNT</u>	<u>PAYMENT #</u>	<u>DATE AMOUNT</u>
112/16/18	\$2,340.00	218/16/20	\$2,404.00	414/16/22	\$2,404.00
21/16/19	\$2,520.00	229/16/20	\$2,404.00	425/16/22	\$2,404.00
32/16/19	\$2,404.00	2310/16/20	\$2,404.00	436/16/22	\$2,404.00
43/16/19	\$2,404.00	2411/16/20	\$2,404.00	447/16/22	\$2,404.00
54/16/19	\$2,404.00	2512/16/20	\$2,404.00	458/16/22	\$2,404.00
65/16/19	\$2,404.00	261/16/21	\$2,404.00	469/16/22	\$2,404.00
76/16/19	\$2,404.00	272/16/21	\$2,404.00	4710/16/22	\$2,404.00
87/16/19	\$2,404.00	283/16/21	\$2,404.00	4811/16/22	\$2,404.00
98/16/19	\$2,404.00	294/16/21	\$2,404.00	4912/16/22	\$2,404.00
109/16/19	\$2,404.00	305/16/21	\$2,404.00	501/16/23	\$2,404.00
1110/16/19	\$2,404.00	316/16/21	\$2,404.00	512/16/23	\$2,404.00
1211/16/19	\$2,404.00	327/16/21	\$2,404.00	523/16/23	\$2,404.00
1312/16/19	\$2,404.00	338/16/21	\$2,404.00	534/16/23	\$2,404.00
141/16/20	\$2,404.00	349/16/21	\$2,404.00	545/16/23	\$2,404.00
152/16/20	\$2,404.00	3510/16/21	\$2,404.00	556/16/23	\$2,404.00
163/16/20	\$2,404.00	3611/16/21	\$2,404.00	567/16/23	\$2,404.00
174/16/20	\$2,404.00	3712/16/21	\$2,404.00	578/16/23	\$2,404.00
185/16/20	\$2,404.00	381/16/22	\$2,404.00	589/16/23	\$2,404.00
196/16/20	\$2,404.00	392/16/22	\$2,404.00	5910/16/23	\$2,404.00
207/16/20	\$2,404.00	403/16/22	\$2,404.00	6011/16/23	\$2,404.00